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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 07-00705 SI
)	
Plaintiff,)	
)	STIPULATION AND [PROPOSED] ORDER
v.)	CONTINUING HEARING DATE AND
)	EXCLUDING TIME (18 U.S.C.
EDMUND JEW,)	§ 3161(H)(8))
)	
Defendant.)	
)	

The parties are currently scheduled to make their first District Court appearance before this Court on Friday, November 9, 2007. The parties hereby jointly request that the Court continue the first appearance date to Friday, November 30, 2007, in light of the travel schedule of both parties' counsel (who will be out of town on the intervening Fridays), as well as the need to supply and review discovery in the matter.

The parties further stipulate and agree that in light of the multiple charges filed against defendant Jew—including the federal Indictment, criminal charges filed by the San Francisco District Attorney, civil proceedings pursued by the San Francisco City Attorney and now authorized by the California Attorney General, and misconduct

proceedings before the San Francisco Ethics Commission—defense counsel will require additional time for effective preparation, taking into account the exercise of due diligence, within the meaning of 18 U.S.C. § 3161(h)(8)(A). Further, failure to grant the requested continuance would deny both the defendant and the government continuity of counsel, within the meaning of 18 U.S.C. § 3161(h)(8)(B)(iv).

Accordingly, the parties jointly request that the Court continue the first District Court hearing date from November 9, 2007, to November 30, 2007.

Respectfully submitted,

Date: _____

MICHAEL LI-MING WANG
Assistant United States Attorney

Date: _____

STEVEN F. GRUEL
Counsel for Defendant Edmund Jew

[PROPOSED] ORDER

Upon stipulation of the parties, and good cause appearing, IT IS ORDERED that this matter be continued from November 9, 2007, at 11:00 a.m., to November 30, 2007, at 11:00 a.m.

The Court further finds, based on the parties' stipulation, that failure to grant the continuance would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and would deny both parties continuity of counsel. Pursuant to 18 U.S.C. § 3161(h)(8)(A), the Court finds that the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial and the prompt disposition of criminal cases.

DATED: _____

THE HON. SUSAN ILLSTON
United States District Judge